

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

MM Docket No. 87-268

In the Matter of  
Advanced Television Systems  
and Their Impact upon the  
Existing Television Broadcast  
Service

Fourth Further Notice of Proposed  
Rule Making and Third Notice  
of Inquiry

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**Reply Comments of Abacus Television**

Abacus Television respectfully submits these reply comments in response to the Fourth Further Notice of Proposed Rulemaking and Third Notice of Inquiry, (FCC 95-315) in the above referenced matter. Abacus Television would like to provide the Commission's Mass Media Bureau and Office of Engineering and Technology of with estimated numbers on LPTV viewership and capital expenditures of eight of the LPTV broadcasters that filed comments in this proceeding on December 13, 1995.

The information in this document was compiled by interviewing eight minority LPTV operators. Despite the fact that Abacus Television only interviewed eight broadcasters, significant deductions and extractions can be made from our findings. Moreover, we believe our findings indicate that existing LPTV broadcasting facilities located throughout the United States are of value and importance to the communities which they serve.

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## **Summary of the Findings**

### **LPTV Viewership:**

- Abacus Television interviewed 8 minority broadcasters. These licenses have a total of 17 stations on-the-air. Three broadcasters have two stations on-the-air; three have single stations on-the-air; and two have each three and four stations on-the-air respectively.
- The total number of viewers reached off-air by these LPTV broadcasting facilities is 14,227,556, an average of 836,915 inhabitants per LPTV station, per community serviced.
- The number of viewers reached through carriage on cable television and/or wireless cable is 762,940, an average of 44,879 per station, per community serviced.

### **Capital Expenditures:**

- The total cost for receiving the LPTV license, construction, and program origination facilities during the start-up loss period for the 17 broadcast facilities were estimated at \$4,664,500, an average of \$274,382 per facility.<sup>1</sup>
- The total cost of the transmission plants for the 17 stations were estimated at \$1,676,900, an average of \$98,641 per facility.

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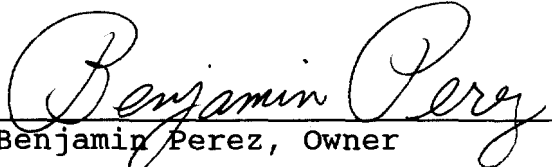
<sup>1</sup> When comparing this investment to other services, such as full power broadcasting, the Commission should keep in mind that the LPTV industry has been built on the bases of 100% equity investments towards the cost of construction, as opposed to older industry segments where up to 90% of the cost of station construction is loan or other debt. As a result, the importance of each of these entrepreneur's investment to their companies is ten times that of a comparable investment by a full power broadcaster.

- The total cost for studio equipment, studio-transmission links, satellite reception systems, and program origination expenses were estimated at \$1,604,100, an average of \$94,354 per facility.
- Costs for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, and other expenses prior to cash flow break even were estimated at \$881,600, an average of \$51,858 per facility.

Furthermore, if we were to multiply the above number by the over 1,600 existing LPTV broadcasters, our figures both in terms of capital expenditures and viewership, would be higher than many other segments of the broadcasting industry. Moreover, to unnecessarily eliminate such community broadcasters that have put all of their efforts to becoming licensees in order to deliver valuable programming and information to millions of viewers in the underserved communities of the United States is equivalent to saying that the FCC does not believe in equitably serving the needs of all citizens of the United States.

Respectfully submitted,

**ABACUS TELEVISION**

By:   
Benjamin Perez, Owner

Abacus Television  
1801 Columbia Road, Suite 101  
Washington, D.C. 20009  
(202) 462-3680

January 16, 1995

Handwritten: F.R. W.R.F.  
D.O.T.

Randolph Weigner  
WAV-TV  
29 Douglas Dr.  
Meredith, NH 03253

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

1,000,000

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Data World Study

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

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II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$1,500,000

- How much of this cost was for the transmission plant?

\$125,000

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$50,000

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

C

Randolph Weigner  
WAV-TV  
29 Douglas Dr.  
Meredith, NH 03253

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## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

850,000

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

DATA WORLD STUDY

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

0

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$1,300,000

- How much of this cost was for the transmission plant?

\$105,000

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$50,000

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

0

**AT THE REQUEST OF THE FCC ENGINEERS  
FOR THE DECEMBER 12TH MEETING**

**LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM**

Please provide the following information on a separate data form for each of your licensed LPTV facilities: W28AW - Greensburg, PA

I. How many viewers are reached by your off-air television signal? Channel 28

Contour A = 1759.44 square mile Block group level Cant  
Contour B = 720.483 square mile Block group level Cant

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Communications Data Services

- How many additional viewers do you reach through carriage on cable TV and/or wireless cable TV systems?

n/a

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

Approximately \$ 17,000 start-up costs

Approximately \$ 100,000

- How much of this cost was for the transmission plant?

Approximately \$ 40,000

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

n/a

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesman draw and other operating expenses prior to cash flow break even?

n/a

**AT THE REQUEST OF THE FCC ENGINEERS  
FOR THE DECEMBER 12TH MEETING**

**LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM**

Please provide the following information on a separate data form for each of your licensed LPTV facilities: **WO9CF - Channel 9, Jacksonville, FL**

I. How many viewers are reached by your off-air television signal?

148,683

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Communications Data Services

- How many additional viewers do you reach through carriage on cable TV and/or wireless cable TV systems?

n/a

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

Approximately \$ 16,000 start-up costs

Approximately \$ 90,000. Construction costs

- How much of this cost was for the transmission plant?

Approximately \$ 20,000

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

n/a

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesman draw and other operating expenses prior to cash flow break even?

Approximately \$ 60,000

## LPTV VIEWERSHIP AND CAPITALIZATION

Please provide the following information  
form for each of your licensed LPTV facilities:

I. How many viewers are reached by signal?

JEFF GABBY  
W1WU TV-5

FORMATION IN 46953

9317)-677-2794 FAX

45,000 TVHH

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Grant County Information

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

16,000 coffee subscribers

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$400,000.00

- How much of this cost was for the transmission plant?

\$75,000.00 + 1000.00 per month Tower Rental

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

#325,000.00

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesman draw and other operating expenses prior to cash flow break-even?

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Comments from Lockwood Broadcasting relating to our LPTV VIEWERSHIP AND CAPITALIZATION form.

1. Lockwood Broadcasting currently owns and operates two low power television stations in the Norfolk Virginia market. This is the 40th television market in the United States. WPEN-LP [channel 68] and W51BH [channel 51] broadcast in harmony to deliver programming and information to a very significant audience base. According to Nielsen our programming reaches well over 450,000 television households. This is a combination of both over the air and cable. There are 11 major cable systems in this market, WPEN currently is carried on 9 of them. This carriage has been secured without a single FCC mandate, as we do not qualify for any "must carry" under the current rules. This has been a classic example of cooperation between broadcaster and cable.

2. Lockwood Broadcasting has invested significant capital in this venture. Since incorporation in late 1992, well over 2 million dollars has been invested in these stations. We currently employ 22 full time employees with 3 part-timers. The average age of our staff is less than 30 years old, more than half of our employees were on staff with us when we incorporated. This is very impressive effort, we are providing not only entertainment to our audience. With the exception of news, WPEN produces more local programming than any other station in the market, full power or otherwise. Recently we reached an agreement with the ABC affiliate in this market to deliver a 10p.m. news. This being a blue collar market we are giving a very unique program to this market that may not available should our station not be here.

3. This station is not yet profitable. We built a business plan that would move us to break even with-in five years. We are very comfortable that this goal will be met. Lockwood Broadcasting will have well over 3 million dollars invested in this station by the end of 1996.

4. Lockwood Broadcasting views the low power industry as a viable one given proper consideration is given it by the FCC. Should technology advances leave the low power industry behind we are of the opinion that the PUBLIC will be a loser and a true grass roots business opportunity will be crushed. Low power television must have a home in the future.



**KHST-TV**

(K66CQ)  
O'Neals, Ca.

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

278,210

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Nielsen Special Study

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

361,300

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$420,000.00

- How much of this cost was for the transmission plant?

\$240,000.00

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$180,000.00

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$25,000.00

**HOME SHOPPING CLUB**

706 W. Herndon Avenue • Fresno, California 93650 • (209) 438-6666

# out of the BOX

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

278,210

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Nielsen Special Study

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

15,000 wireless

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$200,000.00

- How much of this cost was for the transmission plant?

\$150,000.00

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$ 50,000.00

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$15,000.00

K34AV  
Fresno, Ca.



# TV de BOX

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

278,210

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Nielsen Special Study

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

15,000 wireless

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$150,000.00

- How much of this cost was for the transmission plant?

\$100,000.00

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$50,000.00

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$15,000.00

K68EP  
Fresno, Ca.



706 WEST HERNDON AVENUE, FRESNO, CA 93650  
TEL 209/439-6800 • FAX 209/435-3201



## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

1,130,000

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Data World

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

140,000

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

195,600

- How much of this cost was for the transmission plant?

87,500

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

29,900

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

21,900

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

583,324 .

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Data World .

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

N/A .

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

198,500 .

- How much of this cost was for the transmission plant?

69,800 .

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

25,600 .

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

35,300 .

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

4,956,669

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Data World

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

N/A

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

1,113,700

- How much of this cost was for the transmission plant?

208,400

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

278,100

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

626,400

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

185,000 .

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Hand Calculations .

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

N/A .

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

36,200 .

- How much of this cost was for the transmission plant?

13,800 .

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

5,000 .

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

7,000 .



WZBN-TV-25 (W25AW) Trenton, New Jersey

Louis A. Zaroni, 77 Sahdy Lane, Phone (609) 586-5088

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

Over the air viewers that are not on cable = 119,250

- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Manually calculated from statistics of local municipalities.

- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

Viewers in our broadcast area that view us on cable = 215,640

II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$550,000.00

- How much of this cost was for the transmission plant?

Building, Transmitter, Tower, Antenna = \$293,000.00

- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$165,000

- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$92,000

*Louis Zaroni*

## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

800,000

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- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Call in surveys, Census demographics antenna range.

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- How many additional viewers to you reach through carriage on cable TV and or wireless cable TV systems?

Not applicable

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II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$ 834,900.00

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- How much of this cost was for the transmission plant?

\$ 99,400.00

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- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$ 372,500.00

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- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$ 36,000

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## LPTV VIEWERSHIP AND CAPITALIZATION DATA FORM

Please provide the following information on a separate data form for each of your licensed LPTV facilities:

I. How many viewers are reached by your off-air television signal?

35,000

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- How was this number of viewers determine, e.g. Communications Data Services or Data World study, Nielsen or Arbitron special study, hand calculations, etc.?

Call in surveys, Census demographics antenna range

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- How many additional viewers do you reach through carriage on cable TV and or wireless cable TV systems?

Not Applicable

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II. What is the total cost of receiving your LPTV license, constructing your station and program origination facilities, if any, and operating your station during the start up-loss period?

\$ 75,600.00

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- How much of this cost was for the transmission plant?

\$ 40,000.00

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- How much of this cost was for studio equipment, studio-transmission links (STL's), satellite reception systems, and other program origination expenses?

\$ 22,200.00

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- How much of this cost was for post-construction publicity, initial programming acquisition costs, start-up marketing expenses, pre-collections salesmen draw and other operating expenses prior to cash flow break-even?

\$ 6,000.00

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